

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION
GREENEVILLE

KATERI LYNNE DAHL,)
)
Plaintiff,)
)
v.) No. 2:22-cv-00072-KAC-JEM
)
CHIEF KARL TURNER, *et al.*,)
)
Defendants.)

Plaintiff's Motion for Leave to File Certain Documents under Seal

Plaintiff Kateri Lynne Dahl, by undersigned counsel Hugh A. Eastwood and Alexis I. Tahinci, states for her Motion for Leave to File Certain Documents under Seal:

1. Dahl moves to file under seal certain documents that have been filed as exhibits in connection with *Plaintiff's Motion to Stay Summary Judgment, to Re-open Discovery, or, Alternatively, to Supplement the Summary Judgment Record* [Doc. 128].
2. The exhibits contain the names of sexual assault victims of Sean Williams.
3. The following were filed with redactions of the names of sexual assault victims:

Exhibit 3 – Peters Dep. excerpts [Doc. 128-3]

Exhibit 4 – Sparks Dep. excerpts [Doc. 128-4]

Exhibit 5 – Turner Dep. excerpts [Doc. 128-5]

Copies of those exhibits with the redactions highlighted are attached as exhibits hereto.
4. The following is being filed only under seal, as more than 50 percent of its contents are the names, addresses and contact information for sexual assault victims of Sean Williams:

Exhibit 16 – Plaintiff's Second Amended Sealed Key

WHEREFORE Plaintiff Kateri Lynne Dahl prays the Court to GRANT her Motion for Leave to File Certain Documents Under Seal; and to grant such other relief as may be just, meet and reasonable.

Dated: July 3, 2024

Respectfully submitted,

Counsel for Plaintiff Kateri Lynne Dahl

/s/ Hugh A. Eastwood

Hugh A. Eastwood, *admitted pro hac vice*
pursuant to L.R. 83.5(b)(1),

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Certificate of Service

The undersigned certifies that on July 3, 2024 that (s)he filed this document with the District Clerk to be served by operation of the Court's CM/ECF system upon all counsel of record. A copy was emailed to all counsel of record.

/s/ Hugh A. Eastwood